

R&F

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

2024 NOV -8 AM 11:16

In re:

The College of Saint Rose

Debtor.

Chapter 11

Case No. 24-11131

CLERK OF THE  
BANKRUPTCY COURT  
N.D. OF NY  
ALBANY

**NOTICE OF APPEARANCE  
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE THAT Creditor Sodexo Inc. and Affiliates ("Sodexo"), by and through undersigned counsel, enters its appearance pursuant to Bankruptcy Rule 9010(b); and such counsel requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and Sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in these cases be given and served as follows:

Jami B. Nimeroff, Esquire  
BROWN NIMEROFF LLC  
919 N. Market Street, Suite 420  
Wilmington, Delaware 19801  
T: (302) 428-8142  
Email: [jnimeroff@brownnimeroff.com](mailto:jnimeroff@brownnimeroff.com)

PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code, this demand includes not only notices and papers referred to in the Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, email, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive Sodexo's

right (i) to have final orders in non-core matters and certain core matters entered by an Article III judge or entered only after de novo review by a higher court; (ii) to trial by jury in any proceeding so triable herein or in any related case, controversy or proceeding; (iii) to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Sodexo is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved.

Dated: November 7, 2024

BROWN NIMEROFF LLC



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*Attorneys for Sodexo Operations LLC*

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**CERTIFICATE OF SERVICE**

I, Jami B. Nimeroff, hereby certify that on this 7<sup>th</sup> day of November, 2024 I caused a true and correct copy of the foregoing Notice of Appearance and Demand for Service of Papers to be served via first class U.S. Mail upon the following via the method indicated:

Bonnie Pollack, Esquire  
Matthew G. Roseman, Esquire  
**Cullen and Dykman LLP**  
The Omni Building  
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Ste 2nd Floor  
Uniondale, NY 11533  
bpollack@cullenanddykman.com  
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*Via Email*

U.S. Trustee  
Office of the U.S. Trustee  
Leo W. O'Brien Federal Building  
11A Clinton Avenue, Room 620  
Albany, NY 12207  
*Via Federal Express*

/s/ Jami B. Nimeroff  
Jami B. Nimeroff